

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AURELIUS CAPITAL PARTNERS, LP	:	
and AURELIUS CAPITAL MASTER, LTD.,	:	
Plaintiffs,	:	No. 07 Civ. 2715 (TPG)
- against -	:	No. 07 Civ. 11327 (TPG)
THE REPUBLIC OF ARGENTINA,	:	
Defendant.	:	
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BLUE ANGEL CAPITAL I LLC,	:	
Plaintiffs,	:	No. 07 Civ. 2693 (TPG)
- against -	:	No. 10 Civ. 4101 (TPG)
THE REPUBLIC OF ARGENTINA,	:	No. 10 Civ. 4782 (TPG)
Defendant.	:	
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AURELIUS CAPITAL MASTER, LTD. and	:	
ACP MASTER, LTD.,	:	
Plaintiffs,	:	No. 09 Civ. 8757 (TPG)
- against -	:	No. 09 Civ. 10620 (TPG)
THE REPUBLIC OF ARGENTINA,	:	
Defendant.	:	
-----	X	
AURELIUS OPPORTUNITIES FUND II, LLC	:	
and AURELIUS CAPITAL MASTER, LTD.,	:	
Plaintiffs,	:	No. 10 Civ. 1602 (TPG)
- against -	:	No. 10 Civ. 3507 (TPG)
THE REPUBLIC OF ARGENTINA,	:	
Defendant.	:	
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AURELIUS CAPITAL MASTER, LTD. and	:	
AURELIUS OPPORTUNITIES FUND II, LLC,	:	
Plaintiffs,	:	No. 10 Civ. 3970 (TPG)
- against -	:	No. 10 Civ. 8339 (TPG)
THE REPUBLIC OF ARGENTINA,	:	
Defendant.	:	
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**THE CITI ENTITIES' NOTICE OF CROSS-MOTION  
TO QUASH, MODIFY OR FOR A PROTECTIVE ORDER**

PLEASE TAKE NOTICE that upon the accompanying Declaration of James L. Kerr and all attached exhibits, the accompanying Declaration of Rebecca J. Nelson, and the accompanying Memorandum of Law, non-parties Citibank, N.A., Citicorp North America Inc., Citicorp USA Inc., Citigroup Global Markets Inc., and Citigroup Inc. (collectively, the "Citi Entities") will move this Court, at a date and time to be determined by this Court, pursuant to Federal Rules of Civil Procedure 26(c)(1), 45(c) and 69(a)(2), and pursuant to Sections 2304 and 5224(a)(3)(iii) of the New York Civil Practice Law and Rules, to quash, modify or for a protective order with respect to the five information subpoenas dated December 13, 2011 served on the Citi Entities by counsel for Plaintiffs Aurelius Capital Partners, LP, Aurelius Capital Master, Ltd., ACP Master, Ltd., Aurelius Opportunities Fund II, LLC, and Blue Angel Capital I LLC, and for such other relief as this Court deems just and proper.

Dated: New York, New York  
November 7, 2012

DAVIS POLK & WARDWELL LLP

By: 

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Inc., and Citigroup Inc.*